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ABSTRACT

This report addresses the relationship between the school accountability measures required for Title I schools and those put in place by state and local jurisdictions. The document's main focus is on the degree of coherence and compatibility among the multiple accountability systems, as well as the level and coordination of support provided to schools in need of improvement. The report analyzes two state-administered systems (Kentucky and Maryland), two locally developed systems (San Francisco and Chicago), and one large urban district responding to the state-based accountability requirements (New York City). Five major findings regarding the identification and support of low-performing schools in these jurisdictions emerged: (1) most low-performing schools identified by state or local accountability systems are Title I schools; (2) considerable overlap exists between the schools identified for improvement under Title I and those identified in the jurisdictional systems; (3) where there is no overlap, the discrepancy stems primarily from differences in the criteria used for identification; (4) the lack of specified consequences for Title I schools that fail to improve contributes to a relatively low saliency for Title accountability in these jurisdictions; and (5) support provided to low-performing schools (identified by either Title I or jurisdictional accountability systems) varies substantially from jurisdiction to jurisdiction. (Author)

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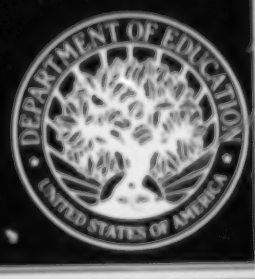

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One System or Two?

Title I Accountability in the Context of High Stakes for Schools in Local Districts and States

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Foreword

In 1996, the Office of Educational Research and Improvement (OERI) of the U.S. Department of Education (ED) funded a study of reconstitution as a remedy for school failure as part of the work of the Consortium for Policy Research in Education (CPRE). Five universities are members of the consortium, which was created on 1985 to improve elementary and secondary education through research on policy, finance, governance, and school reform. Members include Harvard and Stanford universities and the universities of Michigan, Pennsylvania, and Wisconsin-Madison. The consortium's offices are located at the University of Pennsylvania's Graduate School of Education.

During the first year of the reconstitution study, CPRE co-sponsored a national meeting of state and local policy makers and educators who were actively engaged in designing or carrying out high stakes school accountability policies, including school reconstitution and probation. Similar meetings of state level educators had been convened or planned by other organizations, including the Education Commission of the States and the Council of Chief State School Officers. A pattern emerged in each of these meetings that caused some concern among researchers and ED officials involved: throughout the discussions, local and state policy makers and administrators made little if any mention of Title I of the Elementary and Secondary Education Act (ESEA). Criteria for school identification was not being linked to emerging definitions of adequate yearly progress nor was Title I mentioned as a source of support in the low-performing schools targeted for improvement. Given that Title I requires states and/or districts to hold schools receiving Title I funds accountable for improved student performance, and given the expectation that most of the lowest performing schools identified by the states and districts represented at these meetings were Title I schools, this lack of explicit attention to Title I generated the following questions for investigation: What is the relationship between the systemwide provisions for school accountability being developed by some states and districts and the provisions for accountability required and being implemented for Title I schools?

To address this question, the Planning and Evaluation Service (PES) of the ED decided to extend the scope and funding for the CPRE study on reconstitution. The purpose of this

extension was to focus on the overlap and coordination of the state and local accountability systems with the systems being established under the auspices of Title I, to look into supports offered to schools identified by such systems, and to make recommendations for strengthening accountability and support systems for low-performing Title I schools. Originally, four jurisdictions – two states (Kentucky and Maryland) and two districts (Chicago and San Francisco) – were targeted for study. Each of these had established a jurisdiction-wide, high stakes accountability system for its low-performing schools. A fifth jurisdiction – New York City – was added because of the relatively long history of the Schools Under Registration Review (SURR) program in that state.

This report presents a brief review of the findings and recommendations of the investigation of Title I accountability in relation to the state and local accountability systems in these five jurisdictions. The results of the parent study of school reconstitution, on which some of the recommendations are based, will be available in the fall of 1999.

Executive Summary

Background (Section I)

During the past decade, the problem of persistently low-performing schools has received increasing attention from educators, policy makers, and the general public. In response, more than 22 states and several major districts have instituted policies requiring school-level accountability for student performance and sanctions for schools that fail to improve. In 1994, the federal government joined this trend by strengthening the accountability provisions in the Elementary and Secondary Education Act (ESEA) and imposing sanctions for Title I schools that fail to demonstrate adequate progress on standards-based measures of student performance.

This report addresses the relationship between the school accountability measures required for Title I schools and those put in place by state and local jurisdictions for all their schools. Our main focus was on the degree of coherence and compatibility among the multiple accountability systems, as well as the level and coordination of support provided to schools in need of improvement. The sample selected for study included two state-administered systems (Kentucky and Maryland), two locally developed systems (San Francisco and Chicago), and one large urban district responding to the state-based accountability requirements (New York City). Each of these jurisdictions had developed its system-wide accountability policies independent of, and generally prior to, the new Title I provisions.

Findings (Section II)

Five major findings regarding the identification and support of low performing schools in these jurisdictions emerged.

- The majority of the low-performing schools identified by the state or local accountability systems are Title I schools.
- Considerable overlap exists between the schools identified for improvement under Title I and those identified in the jurisdictional systems. This overlap is not absolute, however, and varies considerably among the jurisdictions.

- Where identification of schools by the jurisdictional and Title I systems does not overlap, the discrepancy stems primarily from differences in the criteria used for identification. These differences in criteria, in turn, seem to derive from several inter-related factors: differences in the purposes of the two systems, differences in the official who (i.e. which unit or level) identifies the schools, and general problems in implementation and administrative coordination.

- Lack of specified consequences for Title I schools that fail to improve seems to contribute to a relatively low saliency for Title I accountability in these jurisdictions.

- Support provided to low-performing schools (identified by either Title I or jurisdictional accountability systems) varies substantially from jurisdiction to jurisdiction and often from school to school.

Conclusions (Section III)

Based on these findings, we drew several conclusions pertinent to Title I accountability.

Compliance: All of the jurisdictions were attempting to comply with the requirements of Title I accountability and were doing so primarily by trying to fold Title I accountability into jurisdiction-wide systems in some way. Strategies ranged from complete coherence of the systems (Kentucky), to negotiations for state Title I acceptance of the jurisdictional system (San Francisco), to a division of labor between the systems (Chicago).

Coherence: Despite attempts to make the systems coherent, Title I schools often appear to be subject to dual systems of accountability. While not an immediate problem in most jurisdictions, we expect the lack of congruence among the systems to increase in saliency as the more severe sanctions for Title I accountability begin to carried out.

The Urban Problem: The problem of low performance, accountability, and assistance for schools is particularly acute in urban areas. Schools in large urban districts are more likely to be identified by state accountability systems, and the problem of low performance is likely to be more pervasive in these districts. Special provisions and attention will be required to address this problem.

Recommendations (Section III)

Although not a specific charge of this study, several recommendations for reauthorization of ESEA emerged from this study. Briefly, these are:

1. In reauthorizing ESEA, Congress should remove or revise those processes or provisions that foster the development of a dual system of school accountability for Title I schools.

2. The reauthorized ESEA should place greater emphasis on ensuring that schools in need of improvement receive appropriate, consistent, and intensive assistance from districts and states.

3. Several aspects of Title I accountability guidance regarding criteria and consequences should be strengthened, either by incorporating them directly into law or by working closely with states to foster their implementation. These include the use of multiple criteria for accountability decisions, the incorporation of disaggregated student assessment results into accountability criteria, and the implementation of corrective actions appropriate for the specific problems in identified schools.

Section I. Context and Purposes

"We cannot and must not tolerate failing schools. To meet the new expectations of the American people, we must confront the all-too-common problem of schools that are low achieving and even dangerous...If a school is bad and can't be changed, reconstitute it or close it down."

Richard W. Riley, Feb. 18, 1997

In the mid 1990s, after over a decade of education reform, the public and its policy-makers turned increasing attention to the problem of persistently failing schools -- schools that, even after multiple reform efforts, remained at the bottom on measures of student performance. Policy talk in states and districts began to focus on the need for greater accountability and more drastic interventions in these schools. Meanwhile, in educational and mass media, occasional reports of such interventions, like the 1993 reconstitution of Rusk Elementary School[1] in Houston, began to appear.

As is often the case with education reform trends, the move from policy talk and isolated action to full-blown policy systems occurred at break-neck speed. San Francisco, which had reconstituted four schools as part of a desegregation consent decree in 1983, began to do so on an annual basis in 1994, preceding such action with a two-stage process of identification and assistance. The following year, the Illinois legislature approved a similar multi-stage process for Chicago, which in turn shocked local and national educators by placing 109 of its 554 schools on probation in 1996, threatening them with reconstitution if they did not show improvement.

Nor were state governments standing idly by while districts took up the school accountability banner. By 1997, 22 states had passed "academic bankruptcy laws" allowing them to intervene directly in low-performing districts and schools. Kentucky was among the first such states, having written a system of school rewards and sanctions for student performance into their Kentucky Education Reform Act (KERA) as early as 1990; the first

[1] Olson, Lynn (1995). Starting Over. *Teacher Magazine*, 6. 38-43.

groups of schools were identified under those provisions in 1994. That same year, Maryland started placing schools on an annual list of reconstitution-eligible sites, while New York, Texas, and other states developed their own versions of similar procedures.

Through these actions, states and districts were setting in motion interventions and policies to attend to the problem of persistently low-performing schools. By and large, those policies focus on holding schools accountable for the performance of their students and instituting consequences for continued failure to improve. In light of this trend, it was not surprising when the federal government also upped the ante on school accountability. It did so by instituting a key set of provisions in the 1994 reauthorization of the Elementary and Secondary Education Act requiring states to hold Title I schools and their districts accountable for their students' progress toward meeting the standards applicable for all students. While the notion that schools receiving Title I funds should have to show progress in student performance first appeared in the Hawkins-Stafford Amendments to ESEA in 1988; the 1994 reauthorization, with its emphasis on adequate yearly progress and corrective actions for non-improving schools, was an expansion and deepening of the earlier provisions.

Study Purpose

Current attention to school-based accountability and the institution of high stakes measures for low-performing schools thus derives from several sources – *state* legislation and policies; *local* education agencies; and *federal* programs, particularly Title I. An obvious question is to what extent these various systems for school accountability are working together to improve achievement for all students. That question was the motivation behind this study.

The study reported here focused on five jurisdictions that in the previous few years had instituted high stakes school accountability systems for the schools under their authority Kentucky, Maryland, San Francisco, Chicago, and New York. Our goal was to see how these jurisdictions were incorporating the Title I provisions into their own systems.

- Were the Title I systems and the local and state systems of school accountability coherent and compatible?

- Was Title I being viewed and used as a resource for assisting low-performing schools – or at least low performing Title I schools – identified through the local and state systems?

- And finally, what were some of the lessons we were learning about high stakes accountability systems that might be used to improve the accountability measures in Title I, particularly in preparation for reauthorization of ESEA in 1999?

Because policy coherence is a central goal of standards-based reform, we paid particular attention to the degree of congruence between Title I and the jurisdictional system.

Data: This study was part of a larger investigation of school accountability policies and practices in these and other jurisdictions. Data collection for the larger study included document review (policies, media and research reports, etc.), interviews and meetings with state and local policy makers and administrators, site visits and case studies of reconstituted schools. Additional interviews, document review and analysis of school-level data were conducted for this study in the five jurisdictions.

Report organization: To address the questions above requires an understanding of the key provisions in Title I and in the jurisdictions in question. These provisions are outlined in the remainder of Section I. Section II then reports our findings on the congruence between the systems created by Title I and those established by the jurisdictions for all their schools. Section III discusses the findings and advances several recommendations for improving accountability provisions in the next reauthorization of IASA.

Title I Accountability and IASA

Title I accountability can only be understood within the context of the overall framework of the 1994 reauthorized ESEA. Four aspects of that framework have particular significance for the purposes of this study. They are: the centrality of standards, the emphasis on policy coherence, the attention to professional development and capacity, and performance-based accountability.

Standards

Standards are the lynchpin of the 1994 reauthorization and represent a major departure from previous practice in Title I/Chapter 1. The underlying notion is that all children should have the opportunity to achieve to the same high standards. This approach runs counter to the conventional dual system with challenging curriculum and expectations for some students and a watered-down remedial basic skills approach for others. Too often in the past, Title I/Chapter 1 contributed to this dual system by offering fragmented remedial instruction in pull-out sessions taught by ill-prepared personnel[2]. With the 1994 reauthorization, services to Title I students and schools are intended to enable the children served by Title I to meet the challenging standards established by the state for all its children. Moreover, the legislation requires the states to institute such standards (content and student performance standards) in at least reading and math by the 1997-98 school year; final state assessments aligned with those standards are to be in place by 2000-01.

Coherence

If standards are the lynchpin, coherence is the goal – coherence among the programs of the Act, coherence among the levels of governance (federal, state, local), coherence of policy components (curriculum, assessments, professional development and accountability), and coherence in the educational program available for all students. Much of the criticism of Chapter 1 under previous versions of ESEA was the fragmentation that it engendered, both in the actual program for students – with the emphasis on pull-outs and isolated skills – and also the fragmentation in the system as a whole-- with all the separate accounting mechanisms and personnel and the stove-pipe administration of services for Title I students. The reauthorized ESEA was designed to address that fragmentation and to promote coherence, primarily by helping to pull together all aspects of the instructional program and institutional organization to foster achievement of the state standards.

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[2] According to the National Assessment for Chapter 1

Several specific aspects of Title I reflect this emphasis on coherence. One is the expansion of schoolwide programs and the move away from pull-out services for individual students. Tied to this is the promotion of consolidated planning, in which Title I and other federal monies are to be seen as assistance for a school in developing its overall program to meet the needs of its students and to foster their achievement of the standards. The comprehensive assistance centers, which pull together assistance for all the various titles in ESEA, are another indication of this effort. And finally, the flexibility that states have in developing measures and systems and programs that are consistent with their own standards and the thrust of their educational program is yet another. The availability of this flexibility is particularly evident in the Ed-Flex states, which are able to waive a number of requirements in federal statutes to enhance the coherence and effectiveness of their overall efforts.

Professional development and capacity building

A third integral aspect of ESEA is the importance placed on notions of capacity-building and professional development in support for schools and teachers. A key criticism of earlier versions of Chapter 1 was that often the teachers responsible for instruction – or in many cases the aides responsible for instruction -- to Chapter 1 students were ill-prepared and unable to provide the kind and quality of instruction that students needed. For this reason, an emphasis in recommendations prior to the 1994 reauthorization and in the reauthorization itself was on the need for professional development, encouraging schools and districts to use Title I funds for professional learning – not only that of Title I teachers but of all teachers in the school, as any of them may serve Title I students. The establishment of more comprehensive technical support, and mechanisms like the school support teams to assist schools in planning and developing their schoolwide programs is another example of this emphasis. In addition, as will be noted, provisions were included for providing additional assistance to Title I schools that were experiencing difficulties. Indeed, schools identified as in need of improvement are required to allocate at least ten percent of their Title I funds over a two year period to professional development.

Performance accountability

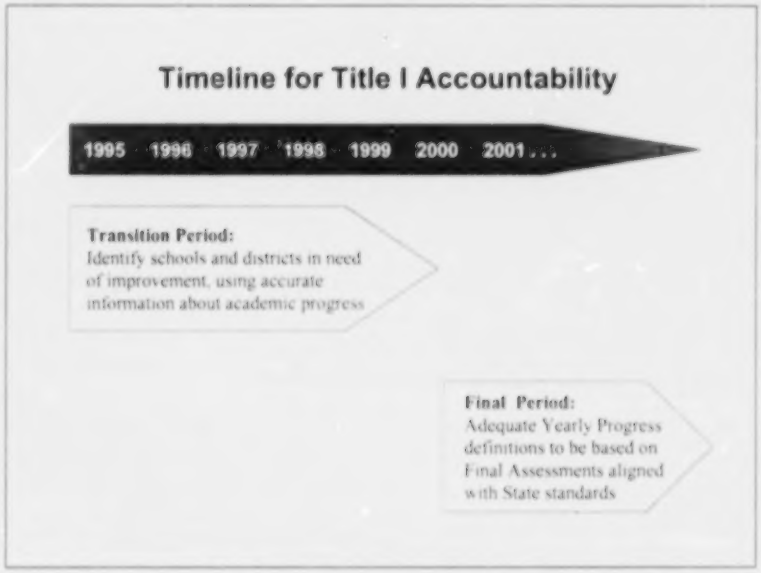
It is the accountability provisions of Title I that are the most directly central to this study. Unlike earlier iterations of Chapter 1/Title I, in which the thrust of the accountability provisions focused on accounting for the use of Title I dollars, the thrust of accountability in Title I since 1994 is on student performance. Thus, states are required to hold districts (LEAs) and schools receiving Title I funds accountable for ensuring that all students meet the state's content and performance standards. The primary mechanism for doing so is the state's definition of adequate yearly progress (AYP), which is based on a model of continuous improvement toward the standards. According to federal guidance for Title I, AYP "must be defined in a manner that –

- Results in **continuous** and **substantial, yearly** improvement of each school and LEA sufficient to achieve the goal of all children served under Title I, particularly economically disadvantaged and limited-English proficient children, meeting the State's proficient and advanced levels of performance;
- Is sufficiently rigorous to achieve that goal within an appropriate time frame; and
- Links progress primarily to performance on the State's final assessment while permitting progress to be established in part through the use of other measures, such as dropout, retention, and attendance rates.[3]"

The specific definitions of AYP in use by the five jurisdictions in this study are summarized in text form in Appendix A of this report and in tabular form in Appendix B.

[3] Taken from the Title I Guidance on Standards and Accountability section III provided by the U.S. Department of Education

Another central feature of Title I accountability is the designation of schools and districts as "in need of improvement" when they fail to achieve AYP for two consecutive years. Such designation brings with it several requirements: the development of an improvement plan, the allocation of funds for professional development, provision of technical assistance, and -- if failure to improve continues -- some form of corrective intervention. "Corrective actions" are intended to take place in the third year following identification. It should be noted, however, that the inclusion of corrective actions is new to this reauthorization and the legislation precludes states from taking the more severe actions listed in this legislation-- withholding funds, revoking schoolwide program authority and decision-making structures, reconstitution, or authorizing student transfers—until their final assessments and final definitions of AYP are in place; that is, no later than 2000-2001. Again, the specific features of the school improvement provisions in the five jurisdictions are summarized in Appendices A and B.



High Stakes School Accountability: The Jurisdictional Systems

To examine the degree to which Title I is incorporated into the systems in these five jurisdictions, it is necessary first to understand both the general framework of accountability in the jurisdictions and some of the particulars of the policies. Our larger study of reconstitution and other high stakes accountability systems suggests the outlines of that general framework. While noting that policies vary in important respects from jurisdiction to jurisdiction across the country, we find them to reflect some common assumptions about accountability and

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improvement efforts in schools. Taken together, these assumptions form a generic "theory of action" (Argyris and Schon, 1978; Weiss, 1995) common to all jurisdictions in this study.

The elements of this theory of action are as follows:

- *The accountability system should be aligned with educational goals.* If increased student achievement is the goal, then student achievement is what educators should be accountable for and what the system should monitor. The belief is that the accountability system will draw attention to the desired goals and focus effort on their achievement.

- *The school should be the basic unit of accountability.* Two beliefs support use of the schools as the unit of accountability. One is that student performance is cumulative and influenced by the entire school program and climate. A second is that a system of collective (school-based) accountability will encourage educators at the school to work together, thus increasing overall capacity and performance.

- *The threat of negative sanctions will motivate educators to work harder, thus improving student achievement.* The underlying belief here is that persistently low student performance stems primarily from educators' lack of will. Whether policymakers attribute this lack of will to institutional racism or to low expectations, to poor school leadership or to well-meaning teachers becoming discouraged by external conditions, the belief is that educators need some external push to do what is necessary to raise student achievement. Negative sanctions are to provide that push.

- *Accountability measures should be accompanied with capacity building.* Policy makers recognize that limited capacity (knowledge, skills, and resources) at the school also contributes to low performance. School probation policies, therefore, also provide assistance and professional development opportunities to help build needed capacity in the schools.

- *Goal-setting, planning, and monitoring results are critical to improvement.* The underlying belief is that very broadly defined goals do little to focus attention, suggest strategies, or provide feedback for improvement. Schools need specific, measurable goals and well-specified plans for achieving them or for modifying practice if they are not achieved. All high-stakes school accountability systems currently in use, therefore, have specified student achievement targets and include site based planning mechanisms for achieving those targets.

- *Some schools are simply beyond help and should be closed down, reconstituted, or taken over.* All the accountability systems discussed here incorporate some last resort measure to intervene and protect students when a school continues to fail after previous interventions. In Chicago and San Francisco, this last step involves the removal and replacement of school administrators and staff as well as some additional

measures. In New York and Maryland, the last resort is mainly a governance change – removing decision-making authority from the school and district (state takeover) – or closure.

Reflecting these common assumptions, the policies in these five jurisdictions nonetheless vary considerably in their particulars. We summarize those particulars in the remainder of this section. It should be noted that we chose these five jurisdictions in order to see both local and state interaction with Title I. Two of the systems examined, Chicago and San Francisco, are locally developed and implemented. Both are relatively large urban districts with very diverse student populations. Two of the others, Kentucky and Maryland, are statewide systems of accountability in which the state holds individual schools accountable for performance, with differing involvement of LEAs in the process. The final jurisdiction, New York City, falls between these two approaches in that it is a large urban district operating within a statewide accountability system[4].

The remainder of this section describes the school-based accountability systems operating in each of the five jurisdictions. Each description includes the designations of improvement and the sanctions used in the jurisdictional system, the criteria employed for placing schools in those designations, the support available to schools once they've been identified, and the numbers of schools in the categories in 1997-98, the year in which data for this study were collected.

Kentucky

School-based accountability for student performance has been a central component of the Kentucky system since passage of the Kentucky Education Reform Act (KERA) in 1990. What is unique about the Kentucky system is that for the past nine years schools have been judged solely on whether their students were *making progress* (relative to the school's previous performance) toward the achievement standards established by the state. The model of

[4] Note Illinois and California have or are developing statewide systems of school accountability which will interact with the locally designed systems in Chicago and San Francisco. The focal systems for this study, however, were those devised and implemented by the local district. Interactions with state systems will be noted as appropriate. New York City by contrast developed specific measures for responding to the designation of its schools as SURR schools. Thus the primary accountability system for New York City was that of the *state*.

continuous improvement underlying this system is highly compatible with the concept of adequate yearly progress outlined in the Title I legislation.

The instrument used for judging school performance in Kentucky is the state assessment system, which until spring 1998 was KIRIS (Kentucky Instructional Results Information System). (A new assessment -- the Kentucky Achievement Test -- is currently under development.) The system measures the progress of each school in the state, relative to the school's earlier performance on KIRIS and to specified biennial targets. Those targets are based on two assumptions: 1) that all students in a school should be scoring at the "proficient" level; and 2) that schools should be able to accomplish this goal within a twenty year period. To achieve this ultimate goal the state established a series of two-year performance targets for each cycle. These performance targets, or "improvement goals," are calculated from a baseline score, defined as the school's accountability index at the beginning of the two-year cycle. The Improvement Goal is set at 10% of the difference between the baseline and 100. Thus, the improvement goal for a school with a base line accountability index of 50 would be 55 for that two-year cycle.

Obviously, under this system, low-performing schools have been expected to make greater proportional gains in performance, as they were the farthest from the goal at the outset of the program. Nevertheless, ALL schools in Kentucky have been subject to accountability for their individually specified targets. Those surpassing their improvement targets have been eligible for rewards, regardless of their absolute performance level. Similarly, both "high performing" and "low-performing" schools have been subject to sanctions if they failed to make the specified gains. Schools whose performance index falls relative to their baseline at the beginning of the biennium, but whose decline is less than five percentage points, are designated as "schools in decline." "Schools in crisis" are those whose performance falls by more than five points or who are in decline for two cycles. Schools are re-designated every two years, based on their meeting or not meeting the improvement targets for that biennium. Our focus for the purposes of this study was schools in "decline" or "crisis."

Through spring 1998, assistance to all schools designated in decline or crisis was provided in the form of a "Distinguished Educator," who worked with the school over a two-year period. Distinguished Educators trained the staff in how to use data for instructional decisions, assisted in the school planning process, and helped to align curriculum and instruction with state standards. Distinguished Educators were highly effective teachers and administrators selected and trained by the state and released from their regular duties for this two-year period. In schools designated as "in crisis," Distinguished Educators also had the authority to evaluate and replace school staff. This system of support, like the state assessment, is currently being revised, based on new state legislation in 1998.

At the time of this study (1997-98), 302 schools for the previous cycle had failed to meet their improvement target. Eighty-two of these were designated in decline, and nine were in crisis. The total of 91 decline and crisis schools were located throughout the state and demonstrated varying levels of absolute aggregate performance.

Maryland

Maryland's high stakes accountability system for low-performing schools was instituted under the leadership and authority of state superintendent Nancy Grasmick in 1994 but traces its origins to a 1989 gubernatorial commission that laid out a similar performance-based system. Beginning with a belief that children have a right not to be forced to attend a failing school by accident of where they live, state policy allows the state Board to directly intervene in failed schools by removing governance authority from the local district. This state "take-over" of individual schools is called reconstitution. To date, no schools in Maryland have been reconstituted in this manner. Instead, the Maryland leadership have focused on declaring schools "Reconstitution Eligible" and requiring local school systems to develop improvement plans for those schools. A larger "alert list" of schools provides LEAs with advance information about schools in need of assistance.

The criteria for identifying Reconstitution Eligible schools is the state performance index (SPI) which is composed of aggregate assessment scores on Maryland State Performance

Assessment Program (MSPAP) or the Maryland Functional Tests (high school), attendance rates, and drop out rates (high school). The state has established a goal of 70% of students at proficient levels of MSPAP and it targets for intervention those schools that are well below that standard and declining in performance. The number of schools targeted each year is based in part on the perceived capacity of the SEA to provide assistance.

The assistance provided, however, is mainly the responsibility of the local districts, each of which must also submit a plan for improvement[5]. Specific interventions for Reconstitution Eligible schools vary and may include replacement of administrators and staff (zero-based staffing) as well as restructuring and professional development.

When the system was instituted in 1994, two Baltimore City high schools were designated as Reconstitution Eligible. Since that time, 90 schools have been named Reconstitution Eligible, 79 of them in Baltimore City. The concentration of Reconstitution Eligible schools in Baltimore, in conjunction with other legal and financial matters, contributed to a legal settlement between the city and the state, known as the Baltimore Partnership. The Partnership, which came into existence in 1997, infuses additional funding into city schools and revamps the governance structure of the school system, replacing the old Board of Commissioners appointed by the mayor with a new board jointly appointed by the mayor and the governor. At the time of this study Maryland had no established criteria for removing schools from the Reconstitution Eligible designation.

Chicago

Prior to the 1995 revision of the Illinois School Code,[6] the central office of Chicago Public Schools lacked the authority to intervene in low-performing schools. The education reform legislation passed by the Illinois legislature in 1988 had decentralized that authority to

[5] A policy slated for implementation in July 1999 will provide greater guidance and assistance to schools that have been in Program Improvement for three consecutive years. These schools will be required to develop and implement a program that incorporates the nine points of a researched based design introduced by the Comprehensive School Reform Demonstration Program. Schools will be provided assistance from the state Title I office and can solicit assistance from external agents.

[6] 1995 Amendatory Act to the Illinois School Code; Public Act 89-15.

Local School Councils. Local School Councils are governing bodies elected by the school community at each site and vested with the authority to hire the principal and set the instructional and management policies for the school. Reformers believed that such decentralization would create a system that was more responsive to student needs and would lead to higher achievement. For many Chicago schools, this governance change worked well. Others, however, remained mired in failure. Faced with a large number of persistently failing schools, the Illinois legislature revised the statutes, establishing a Chief Executive Officer for Chicago Public Schools, appointed by the mayor and vested with the authority to intervene in low-performing schools. The resulting system of school accountability was established under this legislation and the leadership of the current CEO, Paul Vallas.

Chicago's accountability system involves three stages: remediation, probation, and reconstitution. Reflecting the emphasis in Chicago, our focus for this study was on the probation and reconstitution categories. CPS places schools on probation if fewer than 15% of their students are reading at grade level on the ITBS and removes them from probation when 20% of their students are reading at grade level. Reconstitution can occur if a school on probation fails to improve performance. Actual reconstitution decisions are made case by case, based on an evaluation of progress and potential for progress in the school. If the school is reconstituted, the school administration and staff are removed from their positions. Given an opportunity to reapply for their jobs in that school, the staff may be either rehired or reassigned and replaced.

CPS has established a fairly elaborate and multi-faceted system of support and monitoring for probation and reconstituted schools. Each school receives the services of a probation manager, who assists the leadership in developing and monitoring the implementation of the school improvement plan. In addition, each school contracts (with financial assistance from CPS) with an external partner for on-going professional development and capacity building services. The external partners are mostly university-based groups with varying approaches to school improvement. Reliance on external support providers derives, in part, from a CPS desire to involve local universities in improvement efforts. CPS administrators also believed, on the one hand, that support would be better received from outside the system, and, on the other, that

CPS central office simply did not have the capacity to meet the needs of all the schools requiring assistance.

In 1996, 109 (approximately one-fifth) of Chicago public schools were placed on probation. In 1997-98 several schools were removed from the list and others put on, so that during the academic year 115 schools were on probation, while seven high schools were reconstituted[7].

Responsibility for holding Chicago schools accountable for performance does not rest solely with the district administration, however. Chicago also exists within a larger state system of accountability, which differs in important ways from the local. Like Chicago's system, the state has three levels of designation for low-performing schools, but the criteria for identification in the state system is the Illinois Goals Achievement Program (IGAP), rather than the ITBS, and specific consequences for continued failure to improve have not been spelled out. The state requirements are summarized in Appendices A and B and will be discussed in Section II as tied to definitions of adequate yearly progress.

San Francisco

San Francisco's system of school accountability derives from a 1983 desegregation consent decree and the 1993 amendment to that decree. In 1984, four San Francisco schools were "reconstituted" in an effort to desegregate schools in the Bay View Hunter's Point section of the city and to improve the education available to the city's African American and Latino students. Based on advice from an expert panel convened by the court to review the first ten years of the decree, the parties amended the agreement to include a call for "annually reconstituting at least three schools until the task is completed."

To implement the amended decree, the district, under the leadership of the new superintendent Wildemar Rojas, introduced a two-stage process in which low-performing schools were first identified for the Comprehensive School Improvement Program (CSIP) and

[7] Currently 91 schools are on probation and no new schools have been reconstituted.

given a year to improve. At the end of the academic year, CSIP schools could be continued in the program, "graduated," or reconstituted.

The decision to place schools in CSIP was based on a 100-point index comprised of 17 indicators of need and performance. Student achievement, measured by the CTBS, played heavily in the identification process. The decision to reconstitute a school after it had been in CSIP was based on a set of evenly weighted quantitative and qualitative indicators, including a visit to the school by the superintendent and his district team. In San Francisco, when a school is reconstituted, the entire staff is "vacated" and the new staff must agree to adhere to a set of philosophical tenets designed to ensure high expectations for all students. Emphasis in reconstituted schools is also placed on the use of technology, flexible class sizes, professional development and parental involvement to improve instruction and achievement.

Schools targeted by the consent decree are allocated additional discretionary monies as part of the desegregation efforts. In addition, some additional monies are available to CSIP and reconstituted schools, whether or not they are among those targeted by the decree. Starting in 1997-98, these monies were held centrally and are allocated to the schools for specific purposes, primarily professional development activities. Schools have also had the opportunity to receive external consulting, and in the 1997-98 academic year, the district instituted an interdepartmental team to coordinate services and assistance to CSIP and reconstituted schools.

Since 1994, 24 schools have been placed into CSIP; 14 of these have now graduated from the list, 10 schools have been reconstituted. In May 1997, district Superintendent Rojas signed a tentative agreement with the president of the local teachers union to develop alternatives to reconstitution[8]. Two schools have been reconstituted since that initial agreement was signed; none have been placed in CSIP. A new three-tiered accountability system has been planned for the 1998-99 school year, but to date no schools have been placed in that system.

[8] The Trust Agreement remained as of March 1999.

New York City and SURR

New York's state system of school accountability, Schools Under Registration Review (SURR), was initiated in 1989, though a similar program, the Comprehensive Assessment Report (CAR)[9] had begun in 1985. The SURR program is predicated on a state requirement that all schools must be registered to operate in New York and on the authority vested in the state department of education to revoke the registration of schools not meeting state standards. Currently, schools placed in the SURR program have three years in which to meet state standards or be de-certified (i.e., closed down or "redesigned" with a new school plan). (Note: This time limit was instituted by State Commissioner Rick Mills in 1996-97; schools identified before that time were given only two years after this provision went into effect.)

Schools are identified for SURR primarily through test scores on state assessments in reading and math in grades 3, 6, 8 (reading only), and 11. The state has established minimum performance standards on these assessments and requires 90% test-takers in each school to score at or above those standards. In addition, the schools' annual drop out rate must be below 5%. As of 1996, the schools identified for SURR are those determined to be "farthest from the state performance standards." Additionally, schools that offer their students "a poor learning environment" can also be identified for SURR. Three elements contribute to the state's definition of a poor learning environment: poor performance on state standardized tests; parental complaints to the state; conditions such as violence, excessive absenteeism and suspension; or a high percentage of uncertified teachers.

Once identified for SURR, schools are to receive both state and district assistance in their improvement efforts. All schools are required to develop a Comprehensive Education Plan (CEP). In an effort to promote district responsibility and accountability for improvement in SURR schools, the state has also required districts to sign off on the school's CEP and, since 1996, to submit a district Comprehensive Assistance Plan (CAP) for each SURR school in its jurisdiction. Support for SURR schools varies substantially and has been characterized as a

[9] Ascher, C., Ikeda, K., and Fruchter, N. *School on Notice: A policy study of New York State's 1996-97 Schools Under Registration Review Process*, Institute for Education and Social Policy, New York University, 1998.

"patchwork" consisting of a state liaison, district assistance, and opportunities such as the AFT's Teacher Centers located in many New York City schools or participation in various summer institutes and initiatives[10]. In New York City, twelve of the lowest performing SURR schools receive concentrated assistance and monitoring through the auspices of the Chancellor's District. Governance authority for these schools was temporarily removed from the Community School Districts by NYC Chancellor Rudy Crew under the authority granted to him by the state legislature in 1996. The Chancellor's District has its own supervising superintendent whose goal has been to get the schools off the SURR list and to develop their capacity to stay off and continue improving.

Between the academic years 1989-90 and 1996-97, 139 schools had been identified for SURR in New York state, with the vast majority of these being located in New York City. In the last year of that period, 99 schools were still in SURR, of which 92 were in NYC. The 1997-98 school year saw a similar pattern, with 98 schools throughout the state identified for SURR, 94 of these in NYC. Of these 94, 28 had been redesigned and were still designated SURR, and one was in the process of closure. Meanwhile, 18 previously identified schools were removed from the SURR list and 20 new schools added.

[10] See Ascher et al. 1998

Section II. Title I Accountability in the Context of State and Local Accountability Systems

This section presents the key findings of our investigation into the relationship between Title I accountability and local/state accountability systems in these five jurisdictions. Our findings fall into three general categories: identification of low-performing schools; assistance provided to identified schools; and consequences of continued low performance. For each of these, our emphasis is on the issue of coherence and coordination – i.e., to what extent do state and local systems work with Title I to produce a coherent approach to school accountability and improvement? The section concludes with several overarching observations about the degree of coherence and coordination among the systems and presents recommendations for the ESEA reauthorization in 1999.

Identifying Low-Performing Schools

The criteria and processes for identifying and categorizing levels of performance are central features of any performance-based accountability system. Criteria serve to define not only the goals and targets of performance, but success and failure as well. They communicate to schools and the public the system's expectations and provide an indication of who is to be held accountable. As discussed in Section I, the primary unit of accountability in each of the systems in this study is the school, though to varying degrees districts also enter in as accountable units.

We were confronted with two main tasks in this analysis. One was to examine the congruence among the policies governing Title I accountability and those governing accountability for all schools in the given jurisdiction. The second task was to look at the degree of congruence in the results of those policies – that is, in which schools actually get identified. For the purposes of this report, we begin with the second of these tasks. We then consider the criteria and processes outlined in the policy as one set of explanatory variables for the congruence or incongruence in the schools identified.

To address the issue of which schools get identified, we first obtained lists of schools in each relevant category. For example, in Maryland, we obtained from the state a list of all

schools designated as Reconstitution Eligible through spring 1998. We included the schools' Title I status, grade range, location, and so forth. We then obtained the names and locations of Title I schools and Title I schools identified as in need of improvement. Since there is no consolidated list of such schools for the state, this required compiling the data from each county's Title I report. We followed a similar procedure for each of the jurisdictions. From these data, we constructed a data set for each jurisdiction that included Title I schools, schools identified by the state and/or local accountability systems, and schools designated as "program improvement" or "schools in need of improvement" by Title I. Through this process, we were able to produce, we believe, a fairly accurate picture of the incidence and overlap of schools in each relevant category.

Two observations about these data are worth noting, however. First, their collection was not what one might call straightforward. Title I lists and state/local lists were not held in common in any jurisdiction except Kentucky. Differing offices kept records of each group of schools. Moreover, routes to individuals who could actually supply the information was often circuitous – particularly with respect to Title I schools – and these individuals were often unable to provide information on policy processes or support systems. This pattern raises concerns about the degree of administrative coordination of systems, apart from or in addition to concerns about the particular schools identified. Second, because information on the schools had to be obtained from several sources, our conclusions may not jibe exactly with the assumed relationship among the systems in any given jurisdiction.

Below, we present our findings from this analysis. We use Venn diagrams to graphically (though approximately) display the patterns we found. We address three central questions in this discussion:

1. What proportion of schools identified in the state and local systems are Title I schools?
2. What is the degree of overlap between schools identified by the Title I criteria and those identified by the state and local accountability systems?
3. How might we explain the degree of congruence or non-congruence in the two systems?

Finding One: The majority of the low-performing schools identified by the state or local accountability systems are Title I schools. (And, with the exception of Kentucky, the majority of identified Title I schools were higher poverty schools implementing schoolwide programs.)

The proportion of schools designated as low-performing (on probation, Reconstitution Eligible, in decline, etc.) that are receiving Title I funding is displayed graphically in Figures 1a - 1e and in numerical form in Table 1. The proportion of Title I schools ranges from 59% in Kentucky to 93% in Maryland.

Two observations are worth noting. The first is that the high proportion of Title I schools identified by the state and local systems supports the concern that instigated this study. That is, large numbers of Title I schools are apparently subject to at least two systems of accountability for student performance -- that required by the Title I provisions of ESEA and that of the state or local jurisdiction in which the school is located -- and those systems may or may not be sending coherent messages to schools about the goals and targets of achievement. Given the large numbers of Title I schools involved, it thus makes sense to look further into the congruence and coordination among the systems.

State Accountability and Title I Schools

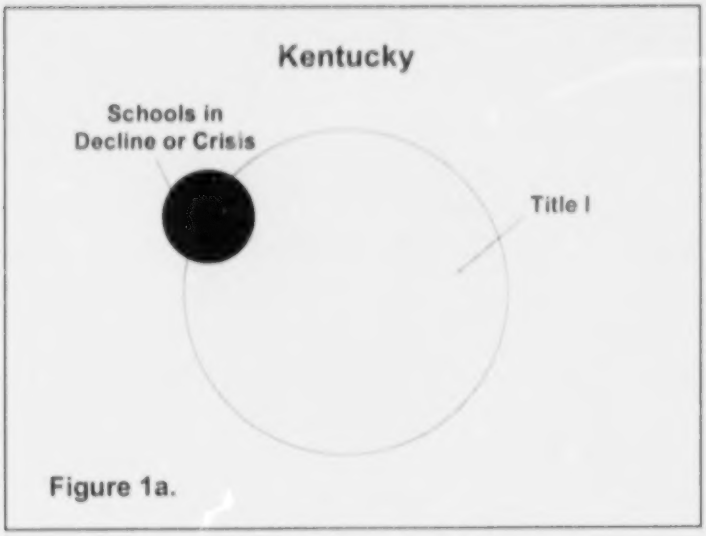

Figure 1a.

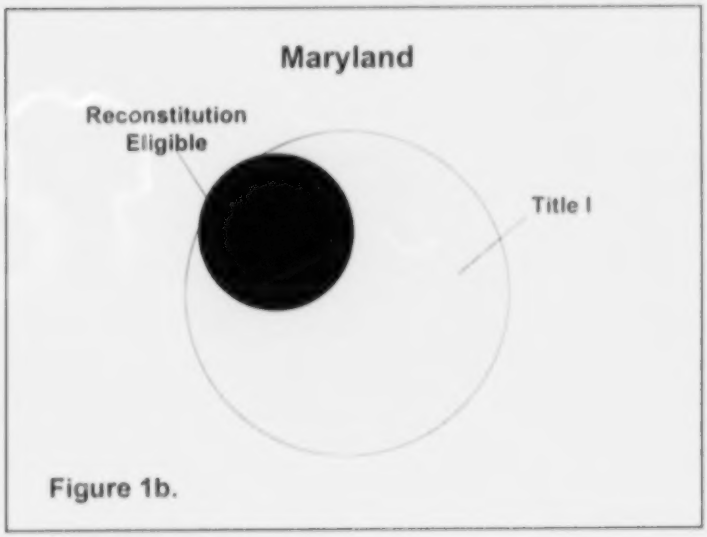

Figure 1b.

Local Accountability and Title I Schools

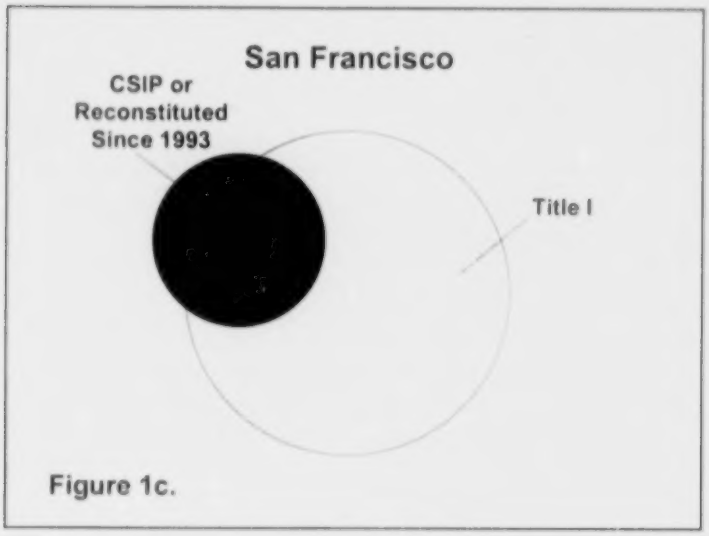

Figure 1c.

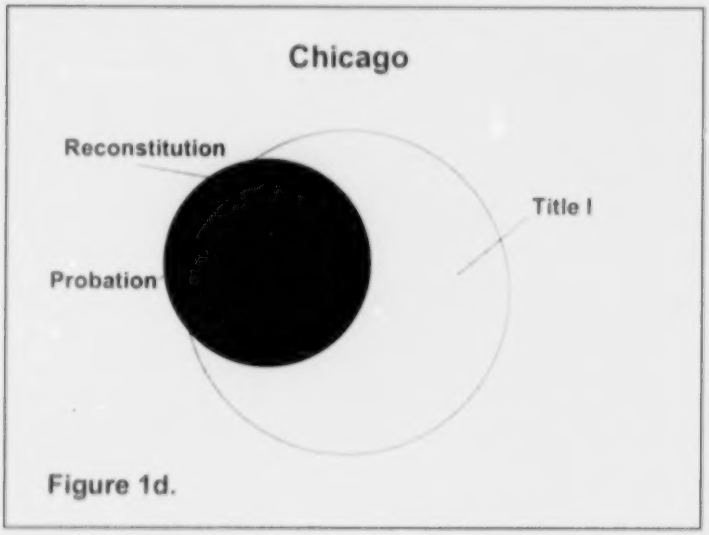

Figure 1d.

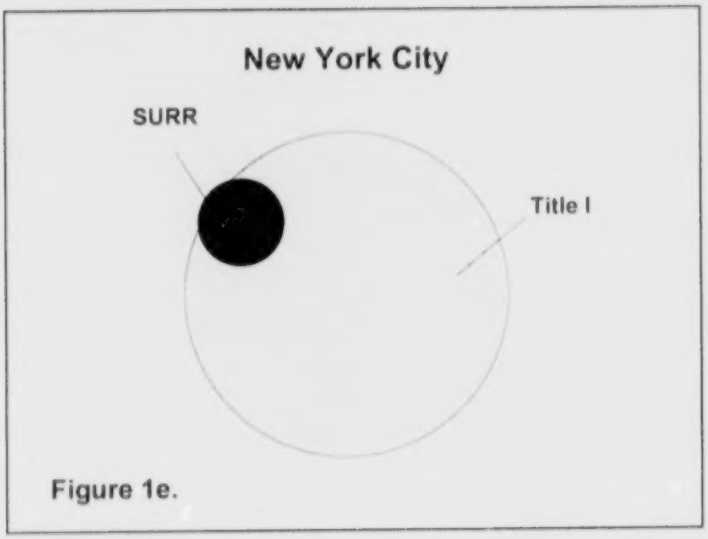

Figure 1e.

Table 1. Title I Schools Identified by Jurisdictional Accountability Systems

1	2	3	4	5	6
Jurisdiction Accountability Category	Number of Title I schools	Total number of schools identified by jurisdiction (c)	Number of Title I schools identified by jurisdiction (d)	Proportion identified by jurisdiction that are Title I (e)	Proportion of Title I schools identified by jurisdiction (f)
Kentucky	897				
Improving, Decline and Crisis (a)		523 (a)	302 (a)	.58	.34
Decline and Crisis schools (b)		91 (b)	53 (b) (9=sw)	.59	.06
Maryland	415				
Reconstitution-eligible		90	84 (57=sw)	.93	.20
Chicago	274				
Probation and Reconstitution		118	88 (85=sw)	.75	.32
New York City	884				
S.U.R.R.		94	86 (47=sw)	.91	.10
San Francisco	64				
CSIP and Reconstitution (1993-98)		24	18 (13=sw)	.75	.28

a. Includes schools in Improving Categories 1 and 2 (schools that show improvement but do not reach their target), Schools in Decline, and Schools in Crisis
b. Includes only schools in Decline or Crisis
c. Total number of schools identified by the jurisdiction-wide accountability system as falling into low-performing categories named in column 1.
d. Number of schools receiving Title I funds that are designated in categories named in column 1.
e. Column 4 / column 3.
f. Column 4 / column 2
sw = schoolwide

A second observation is that while the proportion of Title I schools is substantial in all jurisdictions, it varies significantly from jurisdiction to jurisdiction. Not surprisingly, Kentucky is the jurisdiction with the lowest proportion of its identified schools receiving Title I funds. The apparent reason for this is that Kentucky bases its accountability system on a model of continuous improvement. ALL schools are expected to show progress relative to past performance and to established high standards. Since schools are evaluated based on their own record, relatively high-performing, low poverty (and thus non-Title I) schools in Kentucky are more likely to be picked up by the accountability system and designated as needing improvement than are such schools in systems emphasizing an absolute level of performance.

Meanwhile, San Francisco and Chicago have moderate proportions of Title I schools identified by their local accountability systems. Here the explanation seems to lie more with the level of schooling than the identification criteria. In San Francisco, for example, of the six non-Title I schools that were identified for CSIP between 1993 and 1997, four were high schools. Proportionally, high schools in San Francisco as in other parts of the nation, are less likely to be receiving Title I funds than are elementary schools. In fact, only one of the 64 Title I schools in San Francisco in 1997-98 was a high school, while 54 were elementary schools. By contrast, of the elementary schools identified for CSIP during this period, 100% were Title I.

Finding Two: There is considerable overlap between the schools identified for improvement under Title I and those identified in the jurisdictional systems. This overlap is not absolute, however, and varies considerably among the jurisdictions.

Our next step in the analysis of the identification of schools was to focus in on the overlap among Title I schools identified by the jurisdictional systems and those identified for improvement in Title I. Our findings are displayed graphically in Figures 2a-2d and in tabular form in Table 2. Please note that there are no graph and no figures for San Francisco. At the time of this study, San Francisco was still in negotiation with the state about the criteria for

identifying program improvement schools in the district, so for 1997-98, there were no schools identified for program improvement[11].

For the other four jurisdictions, it is possible to consider the degree of overlap among identified schools in two ways, both of which are indicated in Table 2. One way is to consider the overlap (that is, the intersection of schools identified by the jurisdictional and the Title I systems) as a proportion of jurisdiction-identified Title I schools. The question addressed by such an analysis is what proportion of Title I schools identified in the jurisdictional accountability system were also identified in the Title I system? Alternatively, one could consider the overlap as a proportion of program improvement schools (i.e., what proportion of schools identified for program improvement in Title I are also identified for sanctions in the jurisdictional system?). Taking New York City as an example, we see that in the first instance, 74% of the Title I schools identified for SURR in New York City were also identified for program improvement in 1997. From this perspective, the overlap between the jurisdictional system and the Title I system is quite large. However, if we take program improvement schools as our point of reference, the overlap appears as a small sub-set; more specifically, only 12% of program improvement schools in New York City were also identified for SURR.

[11] From statements made in March 1998 by Dr. Mary Welsh Byrd, Director of State and Federally Funded Projects of the San Francisco Unified School District. See footnote 17.

State and Title I Accountability: The Overlap

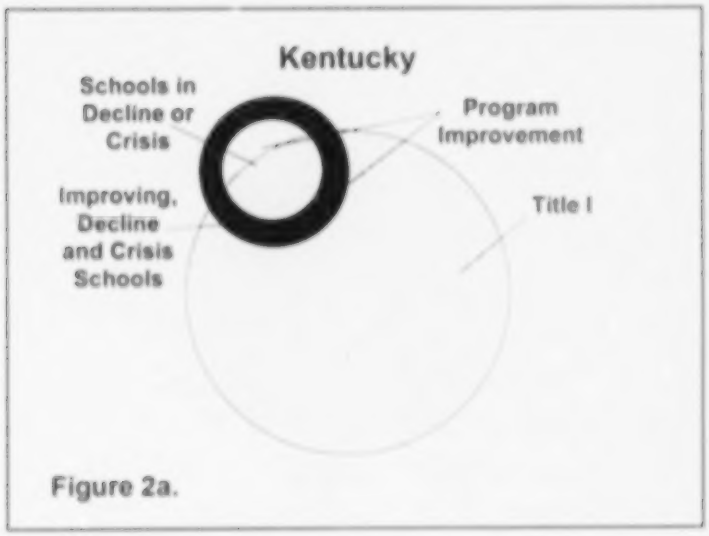

Figure 2a.

Figure 2b.

Local and Title I Accountability: The Overlap

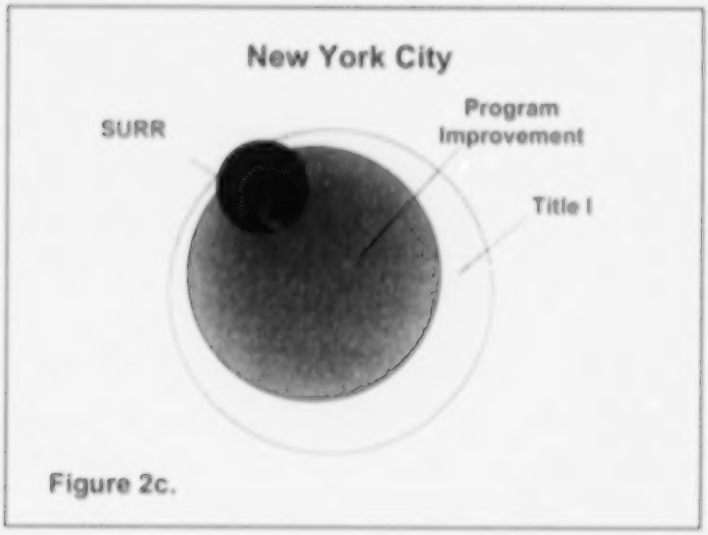

Figure 2c.

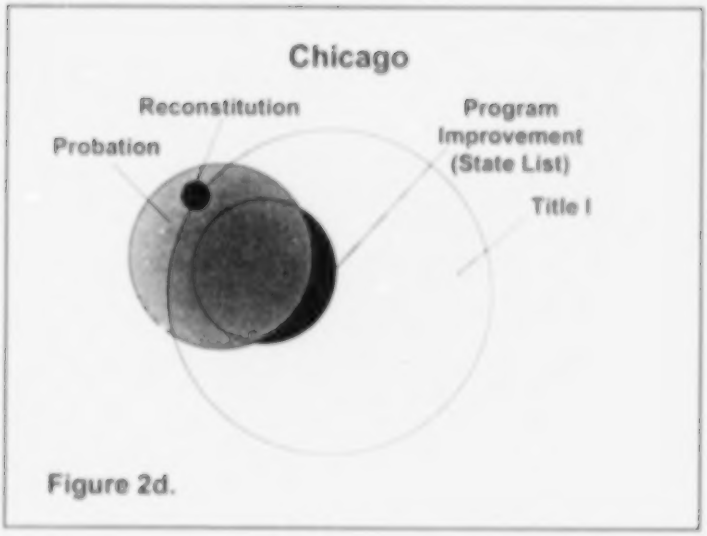

Figure 2d.

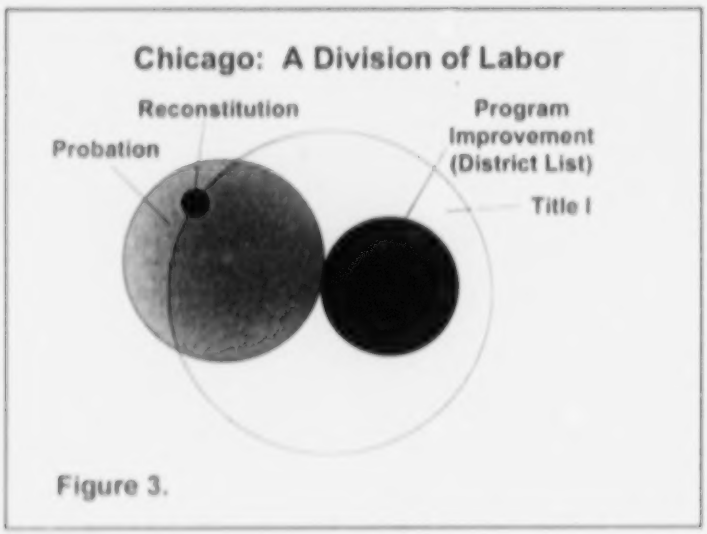
Chicago: A Division of Labor
Reconstitution
Probation
Program
Improvement
(District List)
Title I

Figure 3.

Table 2. Identification of Schools by Jurisdictional and Title I Accountability Systems

1	2	3	4	5	6
Jurisdiction Accountability Category	Number of schools in Title I improvement	Proportion of Title I schools identified for improvement[d]	Number of Title I schools in both programs	Proportion of improvement schools in both programs[e]	Proportion of jurisdiction-identified Title I schools that are also in Title I improvement[f]
Kentucky Improving, Decline and Crisis [a]	302	.34[a]	302[a]	1.0	1.0
Decline and Crisis schools [b]			53[b] (9=sw)	.18	1.0
Maryland Reconstitution-eligible	92	.22	34	.37	.40
Chicago Probation and Reconstitution	65[c]	.27	60	.92	.68
New York City S.U.R.R.	552	.62	64	.12	.74
San Francisco CSIP and Reconstitution (1993-98)	0	0	0	N/A[g]	N/A[g]

a. Includes schools in Improving Categories 1 and 2, Schools in Decline, and Schools in Crisis
b. Includes only schools in Decline or Crisis
c. Number of Chicago Schools on *State* Title I Improvement List (State Warning List).
d. Column 2 of table 2/ Column 2 of Table 1.
e. Column 4/ Column 2, Table 2.
f. Column 4 of Table 2/ Column 4 of Table 1.
g. At the time of this data collection no San Francisco schools had been identified for Program Improvement due to continuing negotiations with the state.
sw = schoolwide

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In Chicago the situation is somewhat reversed, with only 68% of probation schools also on the state Title I improvement list (i.e., the State Warning List)[12] but 92% of Title I improvement schools on probation. In Maryland the situation is different still, with only 37% to 40% of either group being identified by the other. Compare this limited degree of joint identification in Maryland with the total congruence of the two groups in Kentucky; i.e., in Kentucky 100% of program improvement schools are schools identified by the state system as in the improving, decline or crisis categories, while 100% of Title I schools identified as improving, decline, or crisis are also in program improvement[13]. When only decline and crisis schools are considered (because of their similarity to probation or Reconstitution Eligible designations), they form a completely circumscribed subset of the larger group of Title I schools in need of improvement. Thus, 30% of schools in need of improvement were in decline or crisis while 100% of decline or crisis Title I schools were in school improvement.

How do we explain this significant variation among the jurisdictions? What does it mean when a Title I school is identified for improvement by one accountability system and not by the other? Understanding the reasons behind this variation among jurisdictions can provide insights into how the jurisdictions are approaching Title I accountability in the context of their own accountability structures.

Finding Three: Where identification of schools by the jurisdictional and Title I systems is not congruent, the discrepancy stems primarily from differences in the criteria used for identification. These differences in criteria, in turn, seem to derive from several inter-related factors: differences in the purposes of the two systems, differences in who (i.e., which unit or level) identifies the schools, and general problems in implementation and administrative coordination.

Our understanding of the reasons for the discrepancies in schools identified by the two types of systems is based on analyses of the specific policies in each jurisdiction and on

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[12] As we will see, the *district* list for program improvement is another matter entirely (see Figure 3).

[13] The "improving category" is comparable to a "watch list" in many states. These are schools that failed to meet their improvement targets but did not decline in performance. By definition, Title I program improvement schools are all Title I schools falling in the improving, decline or crisis categories.

interviews with state and district personnel. (Summaries of the policies may be found in Appendix A; tables categorizing the criteria, support and consequences for Title I and jurisdictional accountability in each site are in Appendix B.) The most obvious and pervasive reason for the discrepancies in each case is that the two systems are using differing criteria.

Chicago and San Francisco, for example, use completely different assessments in their local accountability systems than those used to determine adequate yearly progress for Title I in their states (ITBS vs. IGAP and CTBS vs. Stanford 9 respectively). Moreover, even where the same assessments are used, results may be defined and interpreted differently in the two systems. In New York, for example, the main criteria for SURR is that the schools are *farthest from* standard on the state assessments; the criteria for Title I improvement is that they are not making *adequate progress* on those same assessments. Finally, systems may differ in the additional criteria they include with the assessments. San Francisco, for example, bases its identification for CSIP on a 100 point index derived from 17 indicators, including student performance, need indicators, grade retentions, and staff stability. According to one local official, the system is neither standards- nor progress-based, both requirements for Title I accountability. While other district administrators would no doubt disagree with that characterization, there is no denying that the constellation of criteria used by San Francisco is unique to that jurisdiction and differs substantially from AYP in other parts of the state.

While the details and specific stories vary by jurisdiction, the use of differing criteria can be traced to several underlying factors: differing purposes of accountability systems, differing levels of governance responsible for identification, and implementation issues.

Differing purposes/targets of accountability

The most obvious example of differing purposes for Title I and jurisdictional accountability is that of New York, where Title I SURR schools (those farthest from state standards) are largely a subset of the larger group of schools not making adequate yearly progress. This pattern does not derive from a decision to relate the systems in that way, however, as is the case in Kentucky. In Kentucky, Title I schools in decline or crisis (the

designations which bring to bear the Distinguished Educators and the threat of more serious sanctions) are the subset of the total group of Title I schools in need of improvement, but they are so as part of a unified, coherent, and multi-level system. In New York, there is no clear relationship between SURR and Title I accountability; it is simply that the state has chosen to target the schools in most severe straights for state intervention. Meanwhile, Title I accountability remains a separate system, targeting schools on a broader basis.

Differing levels of governance

The most common contributing factor to the differing criteria among systems is the level of governance at which identification is defined and made – that is, the state vs. the local district. Again, Kentucky avoids this problem – this time by essentially cutting the local units out of the decision-making process, as all identification is made by the state, based on state tests and state-defined criteria.

By contrast, local districts in New York, Maryland, and California play a considerable role in identifying which Title I schools are in need of improvement. This role is consistent with federal guidelines for Title I: while states define adequate yearly progress, LEAs identify schools in need of improvement. Moreover, the state may allow LEAs to add local assessments or develop their own assessment systems to be incorporated into the definition of AYP and designation of schools needing improvement.

In these three states, the district role in identifying Title I schools in need of improvement leads to some interesting patterns. Consider Maryland (Figure 2b) as a more pronounced case, where the combination of differing levels of analysis and differing criteria at the local level results in a relatively small portion of schools being concurrently identified by both accountability programs. In the first place, the Maryland SEA only *recommends* that districts identify for improvement those Title I schools with a negative change score on the state-determined School Performance Index (SPI). In practice, while LEAs place strong emphasis on MSPAP and the SPI, they also consider other factors such as mobility or relative position among

the county's schools. This means that the criteria for Title I identification will differ from county to county. No such variation occurs in the state accountability system.

Secondly, *all* counties select at least some Title I schools for improvement, generally the schools most in need *relative to others in the district*. In contrast, Reconstitution Eligible schools are concentrated almost exclusively in Baltimore City (79 of 90) and to a lesser extent in Prince George's County (9 of 90). This is because the Reconstitution Eligible designation is reserved for those schools that are at the lowest levels of performance (and declining) *relative to all schools in the state*. Since most such schools are in Baltimore City and PG County, nearly all (88 out of 90) RE schools are located in these two districts. This helps to explain the graph in Figure 2b, as Title I improvement schools in other counties fall outside the RE circle on the graph. In addition, Baltimore City has chosen to target only a subset of its RE Title I schools for Title I program improvement. This explains the large area of the Reconstitution Eligible circle in Figure 2b that lies within Title I but outside program improvement. The end result is that only 37% of school improvement schools are also Reconstitution Eligible and only 40% of Reconstitution Eligible Title I schools are designated as improvement schools.

Maryland is a case where the locally determined Title I accountability system is only somewhat congruent with the statewide system. San Francisco and Chicago represent a different type of local-state disjuncture. In the case of these two cities, the jurisdiction-wide accountability system is local, based on local needs, goals, and context. The criteria for these systems grew out of those local contexts and exists independently of Title I accountability. In San Francisco, the system was created to respond to a court-ordered desegregation consent decree. It pre-dates the 1994 reauthorization of Title I, and district administrators have been negotiating with the state to accept the local system for Title I requirements. Similarly, in Chicago, assessments used for probation and reconstitution determination differ from the state tests used for AYP. While the overlap of schools identified locally for probation and schools identified by the state Title I office is considerable, it is not absolute. Moreover, because Chicago has a well-developed local improvement program for probation schools, they have chosen to define higher-performing "borderline" schools for improvement under Title I. Defined as a sort of "division of labor" between the local accountability system and Title I accountability,

the accommodation results in the targeting of a much larger number of schools for assistance efforts. It also results in the set of "program improvement" schools being completely outside the set of probation schools (see Figure 3).

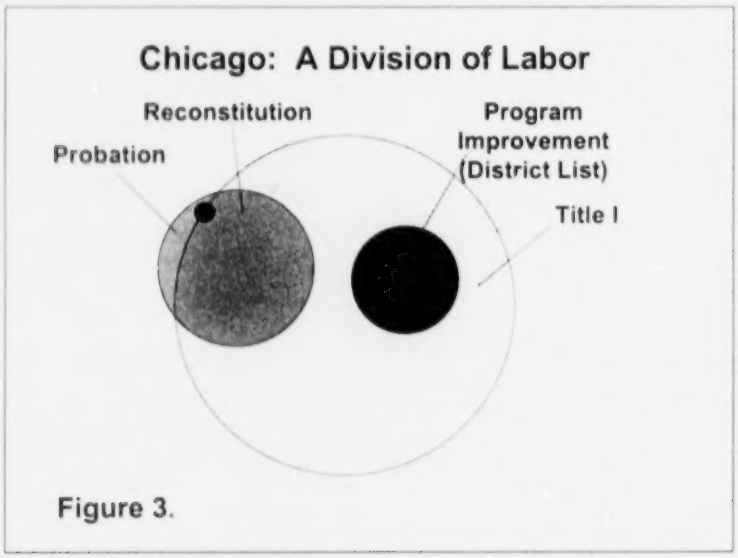

Figure 3.

Implementation issues

A final explanation of differing criteria and results rests in two sets of implementation issues. One issue is that of timing. On the one hand, Title I accountability is meant to be phased in as other provisions are phased in. For this reason, the definition of AYP in most jurisdictions has been in flux over the past few years[14], and sanctions for persistent failure to improve have yet to be determined (see below). On the other hand, some state and local systems pre-date Title I accountability – that is, they have an institutional history that may not be entirely compatible with the specific provisions of Title I.

Added to the timing issue is a second set of implementation problems which center on the continuation of fragmented, stovepipe Title I administration in most jurisdictions. While there

[14]In fact, the Title I guidance suggests that states use the transitional period to experiment with different definitions of AYP.

has clearly been progress in these five jurisdictions in making the systems more coherent, there exists, as indicated in Section I, a continuing division of responsibility and knowledge between Title I and the regular program.

In either case, the result is that schools may be subject to differing tests and differing sets of criteria for Title I and for their local/state accountability systems. To the extent that the legislation and guidance specify a separate system and criteria for Title I, the federal government appears to be contributing to such dual systems.

Sanctions and Assistance for Low-Performing Schools

Findings 4 and 5 focus on the consistency and cooperation in sanctions and support available to schools identified in the jurisdictional and Title I programs.

Finding Four: Lack of specified consequences for Title I schools that fail to improve seems to contribute to a relatively low saliency for Title I accountability in these jurisdictions.

Although Section 1116 of ESEA requires districts and states to take corrective action in program improvement schools that fail to make sufficient progress after three years, significant consequences are not expected to take effect until after the next authorization of ESEA, or at least not before 2000. As a result, many jurisdictions are still in the process of defining what those consequences and corrective steps will be.

When we asked respondents in these five sites about consequences, none were mentioned apart from the requirement that schools identified as in need of improvement develop a school improvement plan. Either the respondent did not know that consequences were required or they did not mention them because at the time they were not yet defined and in place. In either case, we had no indication that the potential consequences called for in the legislation had any salience, either for the administrators or for the schools.

By contrast, the jurisdiction-wide systems of accountability in these five sites had very clearly delineated consequences. Those consequences varied for jurisdiction to jurisdiction, as indicated in section 1 and the tables in Appendix A. But in all cases, the potential for reconstitution, closure, or takeover loomed as a threat over low-performing schools; what's more, the specific nature of the threat in that jurisdiction was well known to the individuals with whom we spoke. We concluded that the consequences outlined in the jurisdictional systems carried with them a saliency that was lacking in the more diffuse (and perceived low stakes) Title I systems.

This difference underscored our impression of separate systems in all but Kentucky (and, at the state-level only, Illinois). It is unclear, how or when the Title I consequences will be defined. With the exception of Kentucky and Illinois, there is no automatic movement of Title I schools into the higher sanctions of the jurisdictional systems.

Finding five: Support provided to low-performing schools (identified by either Title I or jurisdictional accountability systems) varies substantially from jurisdiction to jurisdiction and often from school to school.

Our data on specific support to Title I schools are limited, but overall demonstrate the following patterns:

1. Much of the support in each jurisdiction is focused on helping schools develop and implement an improvement plan that is consistent with relevant requirements and responsive to particular school needs.

The most promising example of the planning process and assistance seemed to be in Kentucky, where consolidated plans were instituted at all levels in the 1997-98 school year. Schools identify needs based on assessment results, analyze causes of problems, and specify actions to be taken. Title I, along with other resources, is allocated strategically to address the needs of the school and district, not to establish a separate program. In addition, a major focus of the Distinguished Educators working with schools in decline or crisis has been to assist them in

using data to assess needs and in developing plans that will align curriculum and instruction with state standards.

Chicago and San Francisco also provide schools with assistance in the planning process. In Chicago, this assistance comes in large part from the probation manager assigned to each school on probation. An important part of the probation manager's role is to help develop the corrective action plan, followed by monthly monitoring of the plan's implementation.

Similarly, all CSIP or reconstituted schools in San Francisco have an assigned liaison from the central office, whose job is to serve as an information conduit and support provider. In the case of the five reconstituted elementary and middle schools, this liaison is the principal of a successful reconstituted middle school. This individual, who works with the schools both individually and collectively through regular meetings of the principals, identified four central foci in his work in 1997-98. One of these was helping with the school improvement plans and another was budgeting. In both areas, Title I was an important point of discussion and assistance. One indication of the importance placed on Title I in this group came in just the second meeting of these principals, held before the start of the 1997-98 school year. At this meeting, the district Title I coordinator presented information on Title I resources, regulations, and options, offering her assistance to the identified schools. She reported to us that this was the first time she had been invited to attend such a meeting of school principals in her several decades as Title I coordinator.

While the planning process is also emphasized in Maryland and New York policies, no specific or consistent forms of assistance in planning were mentioned by respondents from these jurisdictions[15].

It should also be noted that anecdotal information from each of the jurisdictions, as well as our case studies of reconstituted schools, suggests that the effectiveness of the assistance provided for the planning process varies considerably from school to school, depending upon the capacity of the specific assistance provider and the relationship established with the school

[15] See note 3 for changes in Maryland's assistance and improvement planning policy.

leadership. A more thorough investigation of that variation, however, was beyond the scope of this study[16].

2. A variety of other forms of professional development and capacity building are available to schools identified through the accountability systems. The primary source of the support, however, is the jurisdiction, with Title I assistance appearing somewhat peripheral and sporadic.

Again, Kentucky and Chicago have the most *extensive* support – in Kentucky through the Distinguished Educators (DEs) and in Chicago through the external partners (EPs). In both cases, the primary support is that provided by the jurisdiction-wide system; it is also site-based and extensive. The DEs in KY work with schools over a two-year period. The external partners have annual contracts, but schools are encouraged to stay with their external partners for multiple years. In Kentucky, the DEs have received common training and take a fairly common approach to schools, particularly regarding standards and assessments. Chicago's external partners, by contrast, represent a variety of approaches and services from restructuring into small schools to curriculum development to coaching with individual teachers on pedagogical strategies and basic skills instruction. In neither case was there much specific mention of Title I in the context of these assistance efforts, though in Kentucky ESEA regional assistance centers are notified when Title I schools enter decline or crisis. Meanwhile, CPS officials specifically downplayed the usefulness of assistance from the regional comprehensive assistance center or school support teams, primarily because of their limited experience with Chicago's urban context.

This is not to say that Chicago does not have specific assistance for schools in need of improvement. Part of the rationale for the decision to designate "borderline" schools as Title I "program improvement" schools while leaving probation schools to local efforts was to make more rational use of assistance available through Title I resources. Thus, CPS has a separate strategy of program improvement for non-probation, low-performing Title I schools that includes

[16] Several studies of such assistance are currently underway. One is an OERI field initiated study of School Improvement Plans in schools on probation(or a similar designation) in three jurisdictions. That study is housed at the University of Maryland and is under the leadership of Rich Mintrop and James Cibulka.

administrator training and degree programs as well as professional development activities for teachers.

Two of the most *intensive* examples of assistance to identified schools occurred in NYC. One of these was the assistance offered PS 198 by the leadership of Community District 2, and the other was the capacity building efforts of the Chancellor's District, composed entirely of SURR schools. These two cases share many characteristics. In both, assistance was multi-faceted and multi-level, involving coordinated and persistent efforts from multiple providers for both administration and teachers. Moreover, both are examples of the district leadership assuming responsibility for the success of identified schools. Both placed primary emphasis on developing the capacity of school leaders and teachers to engage in high quality instruction. Both worked closely with teacher union leaders, and in both cases, all involved schools were high poverty, Title I schoolwide project schools. Yet these two examples also demonstrate an important difference. In District 2, the strategy used for PS 198 was simply an extension and intensification of the existing approach to school improvement employed throughout the district. By contrast, the Chancellor's District represents a change in governance, initiated precisely because the existing strategies of the relevant community school districts were judged insufficient to ensure success of their SURR schools (see profiles below).

Profile: PS 198 and Community School District 2

PS 198, in Manhattan's Upper East Side and Community School District 2, was placed on the SURR list in 1996 when only 26% of its third-graders met the state's minimum level in reading achievement. The identification brought immediate response from the district leadership ("Not in *my* district!") and mobilization of district resources. The approach to assisting the school was consistent with that used throughout the district: teacher learning is the key to student learning. Emphasis was therefore on professional development. Two highly successful "distinguished teachers" were recruited from elsewhere in the district and assigned to work full-time with four newer teachers in the school, rotating among them in eight-week intervals, modeling, coaching, and co-teaching all day, every day. Other teachers in the school engaged in extensive professional development opportunities two or three times a week, and the principal met regularly with other principals to discuss instructional improvement strategies. In addition, the deputy superintendent visited the school monthly, observing classrooms and monitoring the progress of individual teachers and students. The effectiveness of these visits rested on the relationship established between the deputy and school personnel over a number of years. Title I resources were used to provide additional teacher support in the regular classrooms, and students had opportunities for extended day and summer learning. The central focus of all these efforts was on literacy. Those efforts paid off: in 1996-97, 74% of PS198 third-graders met the state's standard, and the school has subsequently been removed from the SURR list.

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Profile: The Chancellor's District for Instruction

Like District 2, the Chancellor's District (District 85) in New York City, has focused its strategy on building the instructional capacity of principals and teachers. The twelve schools in the district, all on the SURR list, are among the lowest performing elementary and middle schools in the city. In 1996, Chancellor Rudy Crew removed authority for these schools from their respective districts, placing it instead in the hands of a specially created governing unit. Pulling together a bunch of "failing schools" into one district did not immediately engender confidence, however. Rather, that became the job of Supervising Superintendent Barbara Byrd-Bennett, who stressed to the schools, "We're in this together…I believe in you!" Byrd-Bennett's cheerleading was backed up by concrete assistance that allowed the school leaders to believe in the superintendent's words and in her faith in them. The assistance included everything from immediate building repairs to smaller classes to extended days; from developing core leadership teams in each school to monthly principal institutes focused on instruction to school-based instructional coaching; from promoting an absolute focus on literacy to systematic disaggregated data analysis to assistance in recruiting teachers. The intensity of support paid off in District 85 as it had in District 2. The twelve schools of the Chancellor's District posted the largest one-year gains on the city's reading and mathematics assessments in 1998 of all the NYC districts, with the reading gains being twice those of any community school district.

Section III. Discussion and Recommendations

How should we interpret these findings on the congruence of Title I accountability measures and those of states and local districts?

We would stress again the caveats we expressed earlier: in this study we are looking at only a few jurisdictions and those with established systems. We are not sure what our findings mean for states that had not already established or were moving toward similar accountability systems at the time ESEA went into effect. Nonetheless, with respect to these five jurisdictions, several conclusions are worth noting.

1. All of the jurisdictions were attempting to comply with the requirements of Title I accountability and were doing so primarily by trying to fold Title I accountability into jurisdiction-wide systems in some way.

This was most easily and completely accomplished in Kentucky, which had an established, multi-level system of school accountability based on progress toward state standards and assessments. Since there already were standards in place and the state used a model of continuous improvement, Kentucky's system was completely compatible with Title I legislation and guidance. Moreover, no district variation exists, as each LEA uses exactly the same system as the state.

Other states, Maryland, New York, Illinois—and now California, used the same assessments as the basis for both Title I and the statewide accountability system. However, where districts in those state incorporated local assessments or other measures into Title I identification criteria, the result may be the targeting of different schools for Title I and statewide accountability

With regard to the two district-based accountability systems in this study (San Francisco and Chicago) we also see an attempt to fold in Title I, in this case, by negotiating with the state to use the local accountability criteria as the definition of AYP for their schools. Chicago has

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experienced some success in this effort resulting in a division of labor: the Chicago Public Schools Office of Accountability provides assistance and monitoring for probation schools (many of which are on the state Title I list) while the local Title I administrator provides assistance for borderline and "remediation" schools, as part of the locally defined "Program Improvement" program. San Francisco was having more difficulty in their negotiations with the state, but this appeared to be moving toward resolution at the time of data collection[17].

2. Despite attempts to make the systems coherent, Title I schools often appear to be subject to dual systems of accountability. Thus far in the implementation of ESEA, the existence of these dual systems does not seem to be a major problem, but this may be due in part to the fact that consequences for Title I have not yet really kicked in. Title I accountability and corrective action, therefore, do not have high saliency in these sites and thus do not divide school or administrators' attention. It is conceivable that if the dual systems continue, and if corrective actions (such as alternative governance and reconstitution) are applied to Title I schools based upon current definitions of AYP, schools could face similar high stakes consequences coming from differing sources using differing criteria. We could find no clear advantages to such a situation and can anticipate substantial disadvantages in the long run. Overall, this pattern of dual accountability seems to run counter to the general intent of ESEA to foster coherence in educational programming for all students and schools. Moreover, to the extent that the legislation calls for a specific system of accountability for Title I schools, one could argue that it contributes to the creation of such dual systems.

3. The problem of low performance, accountability, and assistance for schools is particularly acute in urban areas. Consider the following findings: in New York City in 1998, 552 Title I schools were identified for program improvement and 96% of state SURR schools were also in New York City. In Maryland, 88% of Reconstitution Eligible schools are in Baltimore City, making up half of the total number of Baltimore schools. In Chicago, one-fifth of the schools had fewer than 15% reading at grade level on a test of basic skills in 1996, and in

[17] No resolution emerged, however, and as of March 1999 no plan for identifying program improvement schools in San Francisco had been approved by the state. Nonetheless in summer 1998 the Title I office designated fourteen schools for program improvement for the upcoming school year and a preliminary list for 1999-2000 shows 32 candidates for program improvement assistance.

San Francisco, ten of its 114 elementary, middle and high schools have been reconstituted in the past four years, while almost a quarter have been identified for CSIP.

Recognizing this high need, urban districts have been developing their own accountability systems – or in the case of Baltimore City having accountability thrust upon them. Any Title I system instituted, therefore, must recognize the special problem of accountability and performance in the urban areas.

Recommendations

Neither our intent nor our charge in this study was to develop a comprehensive set of recommendations for improving accountability provisions in Title I. Nonetheless, two central recommendations from this work are almost unavoidable; they concern the need to guard against the establishment of dual (jurisdictional and Title I) systems of accountability and the need to greatly improve the assistance provided to schools in need of improvement. We have also included a third set of suggestions for strengthening the implementation of several elements already in the legislation or guidance but which are too rarely implemented by the states.

1) Fostering coherence

Based on our findings and analysis for this study, our central recommendation concerns the need to foster greater coherence in school accountability requirements.

> In reauthorizing ESEA, Congress should remove or revise those processes or provisions that foster the development of a dual system of school accountability for Title I schools.

More specifically, we suggest the following:

- To receive Title I funds, states must have in place (by a given time) a system for holding schools and districts accountable for all children making progress toward meeting challenging state standards. This system must apply to all schools, including those covered by the act. Once that system is in place, no separate performance-based accountability system should be applied to Title I schools on the basis of their Title I status.

- In the interim (while statewide systems are being developed), a temporary accountability system for districts and schools receiving Title I funds should be employed, similar to the current provisions for accountability under ESEA.

- If districts develop their own performance-based accountability systems, these should replace or be incorporated into the state systems so that schools are not subject to multiple accountability criteria and processes stemming from implementation of Title I provisions.

2) Building Capacity

Based both on this investigation and on the parent study, we believe that limited instructional capacity is a critical factor in persistent low performance and we see a need to vastly improve assistance provided Title I schools in need of improvement.

> The reauthorized ESEA should place greater emphasis on ensuring that schools in need of improvement receive appropriate, consistent, and intensive assistance from districts and states.

More specifically, we suggest the following:

- Changes to technical assistance provisions of ESEA should be based on a comprehensive review of the technical assistance and professional development currently provided thorough Title I and ESEA (a task clearly beyond the scope of this study).

- Assistance under ESEA should be consistent with and integrated into other local and state-based assistance efforts, rather than under separate authority and administration.

- Districts should be held accountable for ensuring the progress of low-performing schools in their jurisdiction. We recommend that LEAs be required to submit a plan for assisting Title I schools identified in need of improvement along with the improvement plan submitted by each school. The LEA plan should include an examination of district policies that contribute to school failure and a strategy for addressing them.

- Greater resources should be targeted toward ensuring the improvement of teaching and teacher quality in low-performing Title I schools – including allocating more resources for professional development of teachers, administrators, and paraprofessionals and for the recruitment of more qualified staff into these schools. Emphasis must be placed on *instructional* improvement consistent with state standards in these assistance efforts.

3) Strengthening criteria and consequences

Based on this and the parent study, we suggest that several aspects of Title I accountability guidance regarding criteria and consequences be strengthened, either by incorporating them directly into law or by working closely with states to foster their implementation.

More specifically, we recommend that the accountability systems developed by the states, in accordance with Title I provisions:

- Incorporate multiple criteria for decisions about schools and districts. While current law requires multiple measures in final state assessment systems, in practice many jurisdictions rely on a single test for identifying schools in need of improvement. This pattern weakens the legitimacy of the system and raises issues of consequential validity when used for high stakes decisions such as probation and reconstitution.

- Disaggregate results by relevant sub-groups or performance levels in the school and require improvement for sub-categories of students as well as for the school as a whole. One disturbing pattern noted by a number of observers and participants in these systems is a tendency for some schools to concentrate improvement efforts on a certain segment of the student population, such as those on the cusp of a proficiency category or those most easily reached. By doing so, school personnel may increase the relevant measure of aggregate school performance (proportion of students scoring at or above a certain cutoff in some jurisdictions, the mean level of achievement in others) and thus be removed from threat of sanctions. Such practice, however, does not help to ensure progress of *all* students in the school toward the state and local standards. Requiring improvement among relevant sub-groups of students would help to ensure equity in accountability provisions.

- Finally, we support the incorporation of corrective actions into the school accountability systems. We have seen in these jurisdictions how sanctions seem to increase the saliency of an accountability system and to focus attention on improvement targets. However, we would also urge that requirements for corrective actions allow for some degree of flexibility in their design and use, based on local evaluation of the causes of poor performance in a given school and determination of the most effective means of addressing those causes. We also suggest, as a way of increasing district accountability, that districts provide a clear rationale for how the given action responds to the needs of a particular school and its students.

Appendix A:

Policy Profiles

California

Adequate Yearly Progress and State Accountability (AYP)

The definition of adequate yearly progress has been in flux for the past few years. 1996-97 was the first year the state imposed requirements on AYP. The state required all schools to have 40% of its students at grade level to satisfy adequate yearly progress. However, the schools were not advised of the criteria until after the school year was out. To meet the state's demand the districts had to reconstruct scores from the assessments they did perform to evaluate the grade level status of their students. Due to the late information and lack of appropriate assessments, several districts did not report any information on the adequate yearly progress of their schools.

In April 1998 the state established a new set of accountability requirements. The state indicated that the Stanford 9 assessment must be a component in the evaluation of grade level. With this exam the 50th percentile will be the cut off for proficient. However, schools are allowed to consider alternative assessments for students that score below the 50th percentile. Districts could also establish their own measures as long as they were approved by the state.

Additionally, the state decided to include an improvement component to the accountability system. They established 90% meeting or exceeding grade level on assessments based on standards as the target to be met in eight years. Schools are required to meet the average yearly improvement necessary to reach the goal in eight years. A member of the state department of compensatory education indicated that the interim state assessments (Stanford 9) need to be changed. This year the Stanford 9 was used with the 50th percentile mark as grade level. Schools were still offered the option to use other assessments to evaluate the grade level of students that fell below the 50th percentile. The state published guidelines for the use of alternative measures. Next year the state will likely use the augmented SAT/9 with some alignment to state content standards. She also remarked, "It is likely that our state board of education will assign NAEP proficiency levels to scores on the augmented SAT/9."

Support for Program Improvement Schools

Schools can apply for funding or receive technical assistance from a variety of sources. First, schools can apply for Title 1 set aside funds for school improvement. To be eligible, the school must submit a plan for improvement. Schools can receive assistance in professional development from the regional network, a statewide system of school support. Also, schools can receive assistance from the federally supported Comprehensive Assistance Center.

Illinois

Adequate Yearly Progress and State Accountability

Illinois instituted the Academic Early Warning List as a system of school improvement for all schools in the state. This list identifies schools in two categories: "Does Not Meet", also referred to as Level 1, and "Declining." If a school has more that 50% of all Illinois Goal Assessment Program (IGAP) student scores in the school not at standard for two years consecutively, the school is identified in the "Does Not Meet" category. If a school increases the number of below standard students by 20% or more three years following the benchmark year, they are classified as "Declining."(Note: schools can be identified as declining even though more than 50% of the school's students meet standard.)

Once identified as a Level 1 "Does Not Meet" school the state requires the school to meet or exceed standards, or continue to make adequate yearly progress until the goal is met. Schools that meet the standard are removed from the warning list. Otherwise, the school will remain on the list as long as the school makes adequate yearly progress. If a school fails to meet the standard and does not make adequate yearly progress after two years on the warning list, the school is placed on the academic watch list.

Schools classified as "Declining" can be placed on the academic watch list if the school has declined such that more than 50% of its students do not meet standard for two consecutive years. Declining schools lose this designation when the percent of IGAP scores at or above standard equals the average percent of scores at standard for the previous 4 years.

Adequate yearly progress is defined in terms of progress toward a goal of 50% IGAP scores at standard over five years. Therefore, adequate yearly progress is satisfied if a school increases the percent of IGAP scores meeting standard by one fifth of the difference between the benchmark and 50%. Despite this seemingly strict formula, a representative in the state board of education indicated that in practice meeting adequate yearly progress is less strict. She explained that the state performs a rather subjective evaluation of progress. Schools generally just need to report their progress and what the school has done to raise scores.

Probation/Reconstitution policy in the Chicago Public Schools (CPS) also relies heavily on test scores. However, Chicago also examines attendance rates and drop out rates in high schools. Identification of failing schools is made at the district level. Schools are first identified for remediation based on IGAP scores. The second level of identification is probation. The basic criterion for probation is performance on the Iowa Test of Basic Skill (ITBS) and Tests of Academic Proficiency (TAP). If less than 15% of a school's students achieve national norms, the school is subject to probation. The district also considers attendance rates, dropout rates, and IGAP scores for borderline schools. Finally, schools that the district determines have not progressed, or declined during probation are identified for reconstitution.

State and CPS criteria for entering the accountability process appear to be aligned in two respects. First, IGAP scores are used to identify schools for academic warning and remediation.

Second, CPS recognizes removal from the state academic watch list as one criterion for removal from the probation list.

Support for Program Improvement Schools

The state requires all schools on the academic early warning list to develop a School Improvement Plan (SIP) that must be submitted to the local school board or local school council (LSC) and the state superintendent. To assist schools in this process the state board of education provides a staff member to work with the school. In Chicago the probation member serves as the contact with the state instead of an Illinois state board of education (ISBE) staff member. Schools also qualify for targeted school improvement funds from the state. Finally, every two years a panel of outside educators, parents, and community members will evaluate the schools' services, the impact of these services on student learning, student work, and achievement data. This process is known as a Quality Assurance External Review.

Title I schools that fall on the Academic Warning list receive all of these services as program improvement schools. There was very little discussion of school support teams (SSTs).

Kentucky

Adequate Yearly Progress and State Accountability

Title I accountability is based on the statewide accountability system. All Title I schools identified as improving, improving category 2, decline, and crisis are identified as improvement schools. Until this year only crisis schools had staff placed on probation.

The schools are rated by the accountability index. The index score of 100 implies that 100% of students are proficient, there was no retention, no drop-outs, and 100% of students successfully transitioned to adult life. Clearly, 100 is the optimal goal. In reality, schools are indexed at the beginning of a biennium and this index is identified as the baseline. Schools then identify an improvement goal. Schools that meet or exceed the improvement goal are identified as successful or reward schools. Schools that do not meet the goal but improve are identified as improving or improving category 2. Schools that decline are identified in decline or crisis. Prior to the most recent legislation, schools that fell more than five points on the index were identified in crisis.

Assistance to Improvement Schools

All schools in decline, in crisis and improving category 2 receive the assistance of state Distinguished Educators (DEs). DEs provide assistance in developing and implementing the SIP. Also, these schools qualify for Commonwealth School Improvement Funds. Title I schools receive all of these services but also regional school support teams are notified of their status. These SSTs assist in developing the SIP and improvements. However, their involvement is less intensive that DEs. Other than the SST services, Title I schools receive the same assistance as non-Title I schools.

Maryland

Adequate Yearly Progress and State Accountability

The state relies on the School Performance Index (SPI) to track the success of schools. Elementary Schools are at standard when on average 70% of the school's students score satisfactory on the content exams and attendance is at 94%. The standards for a middle school are 94% attendance, 70% satisfactory on the Maryland School Performance and Assessment Program (MSPAP), and 95%, 85%, and 90% on reading, math, and writing respectively on the Maryland Functional Test (MFT). The standards for a high school are 94% attendance, 97% retention, and 95%, 80%, 90%, 85%, 90% scoring satisfactory on the MFT reading, math writing, citizenship and all 11th grade exams respectively. It should be noted that attendance, retention, and average outcomes on exams are weighted equally in the SPI.

The state suggests that all districts identify schools at standard and schools showing substantial or sustained progress toward the standards as meeting adequate yearly progress. The state also recommends that all schools with a negative change in the index should be identified for school improvement. However, Local education agencies (LEAs) identify schools in their districts. Discussions with some LEAs revealed that not all schools with a negative change index are identified. Also, some schools that show a positive change index may be identified if the school is particularly needy. In identification LEAs appear to place a strong emphasis on the MSPAP and SPI. However, they may choose other variables such as mobility, relative position among the county's schools, or severity of decline. The limited sample suggests that a uniform standard across the state does not exist.

Baltimore City schools focus on the School Performance Index as the basis for identifying schools that fail to meet adequate yearly progress. The director of compensatory and funded programs for the Baltimore City Public Schools stated that " All schools with a negative SPI are identified as potential needs improvement sites." Furthermore, he indicated that only schools with a negative SPI are considered potential "Title I schools in need of improvement." However, schools with a negative SPI may not be identified if indicators from other achievement data or special circumstances suggest that the school should not be identified.

Prince George's County's process of identifying schools for Title I school improvement makes direct reference to the state's reconstitution policy. The primary criteria determining adequate yearly progress are the MSPAP and the Comprehensive Test of Basic Skills. All Reconstitution Eligible schools are identified for Title I school improvement. Schools with a negative SPI are identified for improvement if they are identified as Reconstitution Eligible, 21st Century, Alert, or Title I schools not meeting adequate yearly progress..

Identification as a Reconstitution Eligible school is made at the state. Schools that may be identified as Reconstitution Eligible are below standard and declining even after developing and implementing a SIP. Currently, only 90 schools are identified as Reconstitution Eligible schools.

Support for Identified Schools

Apparently, districts in the sample discussed above help schools develop and implement SIPs. St. Mary's county also provides resource people to help in the schools. Counties such as Anne Arundel have identified a county alert list on which all the improvement schools fall. All schools on this alert list receive assistance. There was almost no talk of school support teams. The former director of compensatory programs explained that the state is developing a new school support team comprised primarily of retired teachers and administrators. However, this SST is not yet established and is only intended to work with schoolwide programs whether they are improvement schools or not.

New York

Adequate Yearly Progress and State Accountability

In 1996 the state targeted 2001 as the year all schools should reach the regent's standard. This standard is 90% of students in a school reaching the state benchmark. Given this state target, adequate yearly progress is defined as progress to reduce the gap between the 1996 mark and 2001. Schools with base line in 1996 and 1995 are expected to reduce the gap by 20% each year beginning in the 1996-97 school year. Schools with a base line from 1997 must reduce the gap by 25% each year. All schools that achieve the 90% standard are expected to maintain the standard to satisfy adequate yearly progress. A publication from the Division of Assessment and Accountability states that " schools which fail to meet their adequate progress target or fall below 90% threshold are to be identified in need of improvement."

The Schools Under Registration Review (SURR) process also targets 90% of students achieving the state standards. However, the state also places a minimum requirement on drop out rates, and considers the whole school environment. First, the state expects that the drop out rate be no higher than 5%. Second, the state identifies schools with a poor learning environment. Three elements contribute to the state's definition of a poor learning environment. These elements include 1) poor performance on state standardized tests, 2) parent complaints to the state, 3) conditions such as, high violence, excessive absenteeism and suspension, or high percentage of uncertified teachers. Schools identified for SURR are those furthest from the minimum standards or schools identified as a poor learning environment.

SURR and Title I accountability processes incorporate the same state assessments. However, New York City (NYC) uses local assessments for Title I identification. Since SURR schools are identified by the state, local assessments are not incorporated.

Support for Program Improvement Schools

Title I improvement schools receive assistance from the community school district and NYC Title I school support teams (SSTs). However, SSTs focus their attention on schoolwide programs. Schoolwide programs identified for improvement receive a very high priority for intensive assistance. This assistance comes in the form of:

1. Schoolwide planning
2. Developing assessments aligned with state standards
3. Capacity building
4. Intensive on site assistance

Appendix B:

Comparison Tables of Accountability Policies

Illinois

STATE IDENTIFICATION

	Academic Warning List	Declining Schools	Academic Watch List
Criteria	Less than 50% of students in the school meet state standards.	The percent of students meeting standard declined by 20 or more percent over three years.	Failure to meet adequate yearly progress for two consecutive years
Consequences	Required to develop a plan for improvement. Schools are expected to make adequate yearly progress or meet the 50% level.	Required to develop a plan for improvement. School is expected to raise the percent of students meeting standard to a level equal to the average level for the previous 4 years.	
Support	1. State board provides a staff member to assist in developing improvement strategies. 2. Participation in a Quality Assurance External Review	1. State board provides a staff member to assist in developing improvement strategies. 2. Participation in a Quality Assurance External Review	

Illinois cont.

CHICAGO IDENTIFICATION

	Remediation	Probation	Reconstitution
Criteria	Low test scores on IGAP	Less than 15% meeting national norms on ITBS and TAP, and failure to improve under remediation	Failure to improve after two years on probation
Consequences	Must develop a plan for school improvement	Must develop a plan for school improvement	1. School is re-staffed. 2. Must develop a plan for school improvement
Support	Assistance developing the improvement plan	Provided a probation manager and external partner to assist in developing and implementing the improvement plan	Provided a probation manager and external partner to assist in developing and implement the improvement plan

Kentucky

	Improving	Improving Category 2	Decline	Crisis*
Criteria	Improvement was less than the goal for the present cycle.	The school's improvement in the present cycle was less than the goal AND the school was identified improving, or decline in the previous cycle.	The school's index fell below the benchmark for the current cycle, but the decline was less than 5 points.	The school's index fell more than 5 points below the index for the present cycle.
Consequences	1. Identified for Title I school improvement 2. Required to develop a SIP	1. Identified for Title I school improvement 2. Required to develop a SIP	1. Identified for Title I school improvement 2. Required to develop a SIP	1. Identified for Title I school improvement 2. Required to develop a SIP Teachers are placed on probation.
Assistance	Regional school support teams (SSTs) are notified of Title I schools identified for improvement. SSTs provide assistance with SIP and improvements.	1. Regional SST notified for Title I schools 2. Assigned a DE 3. Eligible for School Improvement Funds	1. Regional SST notified for Title I schools 2. Assigned a DE 3. Eligible for School Improvement Funds	1. Regional SST notified for Title I schools 2. Assigned a DE 3. Eligible for School Improvement Funds

*Note: Crisis category no longer exists under the new legislation.
SIP = School Improvement Plan
DE = Distinguished Educator

Maryland

	Title I School Improvement	Reconstitution Eligible	State Take-over
Criteria	1. Title I school 2. Failure to meet or show substantial and sustained progress toward the standard of 70% satisfactory on MSPAP and other elements incorporated in the SIP	Identified by the state as a school that is below standard and fails to make progress or declines after developing and implementing a SIP	
Consequences	Required to develop a SIP		Operation of the school is handed over to an external agent.
Assistance	Varies by district		

SIP = School Improvement Plan.

New York

	School Improvement	SURR	Redesign
Criteria	Failing to meet the 90% standard and failure to make 20% improvement toward the 95 standard	1. Schools identified by the state as farthest from the standard. 2. Schools identified as a "poor learning environment"	Failure to Improve after SURR identification
Consequences	Required to develop a Comprehensive Action Plan	1. Districts are required to develop a corrective action plan that outlines their support of SURR schools. 2. Schools must develop an improvement plan with the district. 3. District is required to designate a special liaison to work with the SURR schools. 4. Schools are identified as Corrective Action Schools following once the plans have been approved.	1. School must close and re-open under a new school plan.
Support	1. Assistance for community school district to develop a local assistance plan (LAP) 2. NYC school support teams assist with school-wide programs.	1. State provides registration review teams to assess needs of the school and resources needed. 2. State provides a set of liaisons to help interpret regulations. 3. Continued monitoring of progress for up to 3 years.	